

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
(Columbia Division)**

United States *ex rel.* Christopher F. Young,
Plaintiff-Relator,

Civil Case No. 9:20-2959-BHH

v.

LaFarge Corporation, LaFarge North
America, Inc., LaFarge Building Materials,
Inc., Argos USA Corp., Argos Cement LLC,
Argos Ready Mix LLC, Argos USA, LLC,
Greg Melton, Pat Mooney, and Richard A.
Stankwytych,

Defendants.

**DEFENDANT RICHARD A. STANKWYTCH'S MOTION TO DISMISS RELATOR'S
SECOND AMENDED COMPLAINT**

Defendant Richard A. Stankwytych, by counsel and pursuant to Fed. R. Civ. P. 12(b)(6), respectfully requests that the Court dismiss Plaintiff-Relator Chris Young's Second Amended Complaint (D.E. 30) with prejudice because Relator's complaint fails to allege causes of action against Mr. Stankwytych under the False Claims Act, as explained in more detail in the accompanying Memorandum of Law and in Co-Defendants' Argos USA, LLC and Pat Mooney's Memorandum of Law (D.E. 56-1), which Mr. Stankwytych incorporates in its entirety.

Date: September 9, 2022

Respectfully submitted,

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*Counsel for Defendants Argos USA LLC,
Richard Stankwytych, and Patrick Mooney*

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September 2022, the foregoing Motion to Dismiss was filed electronically with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record in this matter.

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